

EXHIBIT 7

1 THE VIDEOGRAPHER: We are now on the
2 record. My name is David Kim. I'm a videographer
3 for Golkow Litigation Services. Today's date is
4 June 29th, 2021 and the time is 1:11 p.m. Pacific
5 Time.

6 This remote video deposition is being held
7 in the matter of Risto V Screen Actors
8 Guild-American Federation of Television and Radio
9 Artists for the Superior Court -- or the U.S.
10 District Court of the Central District of
11 California. The deponent is Julie Sandell Volume 2,
12 all parties to this deposition are appearing
13 remotely and have agreed to the witness being sworn
14 in remotely.

15 Due to the nature of remote reporting,
16 please pause briefly before speaking to ensure all
17 parties are heard completely.

18 Will counsel please identify themselves.

19 MR. BRANCOLINI: This is Nico Brancolini of
20 Kiesel Law on behalf of plaintiff and the class.

21 MS. MCCONNELL: Marianna McConnell from
22 Kiesel Law.

23 MR. LIFSCHITZ: Daniel Lifschitz from
24 Johnson & Johnson on behalf of plaintiff and the
25 class.

1 you want to.

2 MR. BRANCOLINI: We can move on for now.

3 BY MR. BRANCOLINI:

4 Q. Ms. Sandell, was there anybody present with
5 you when you picked the random starting point for
6 the songs used in the 50-song study?

7 A. No. I was home alone.

8 Q. Working remotely, presumably, correct?

9 A. Yes.

10 THE STENOGRAPHER: I'm sorry. I missed
11 that.

12 THE WITNESS: I was working remotely from
13 home.

14 BY MR. BRANCOLINI:

15 Q. And so what was the significance of
16 starting approximately halfway down the list?

17 A. I wanted -- I knew I wanted the titles to
18 be sequential so there wouldn't be any gaps that --
19 that could look like I cherry picked them. And I
20 didn't want to use the top 100 or the top bottom or
21 come up with some sequence of 10 here and 10 there
22 and -- so although it's not scientifically and
23 statistically sound, I thought I could defend, if I
24 had to, and I could be wrong, that if I, with good
25 intentions, started at the top of the spreadsheet

1 and closed my eyes and spun my -- my mouse,
2 somewhere to where I thought was the middle and if
3 I -- with all honesty and no disregard for the
4 truth, pick the title where my cursor was, which was
5 Celine Dion, and pick the next 100 titles, that --
6 from the list that Andrea gave me that I did not
7 create, that I at least could feel comfortable
8 saying that I did not cherry pick these titles and
9 that they were sequential and -- and there was --
10 there was no monkeying with the spreadsheet that was
11 given to me and I purposefully sent that in e-mail
12 to my boss so she could see them so that we couldn't
13 start researching and then maybe, like, oh no, I
14 don't like these. I want to pick some different --
15 we didn't -- I wanted there to be a record so
16 that -- and we did not do that. And -- so I have to
17 say it isn't -- it wasn't exactly halfway down I
18 wanted -- if I stated that on the record, I wanted
19 to say that it's more in the top third where the
20 titles start, or even higher. And I can't answer,
21 you know, questions about -- about representation of
22 those 50 titles, if you will.

23 Q. I -- it's not a huge priority. I mean --
24 Did you ever talk to Mr. Nulty or anyone
25 else about using a more scientific method of

1 as to uses union data.

2 BY MR. BRANCOLINI:

3 Q. Do you understand, Ms. Sandell, or do you
4 need me to rephrase?

5 A. Yeah, that's five years of titles --
6 that's -- that -- the -- this document was created
7 based on whether there was union session reports
8 received as a source in the title or whether the
9 symphonic department used the AFM's ICSOM membership
10 rosters to pay people.

11 Individual titles are -- especially the
12 ones at the top of any of these distribution years
13 would have been reviewed and vetted and revetted
14 by -- by senior members of my department in
15 preparation for every distribution and if there's
16 anybody who has uncashed checks or allocated monies,
17 we would certainly use the union membership roster
18 to reach out and contact them and --

19 Q. So did you -- why did you --

20 A. Yeah. Go ahead.

21 Q. Sorry. What steps did you do in the year
22 of 2021 to verify this information?

23 Did you just pull it directly from the
24 AS400 and not do anything beyond that?

25 A. Correct.

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